

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA)	
)	DOCKET NO. 3:17-cr-182-MOC
v.)	
)	
(1) ALEXANDER SAMUEL SMITH)	
a/k/a "Amir Alexander")	
_____)	

GOVERNMENT'S OBJECTIONS TO DEFENSE JURY QUESTIONNAIRE

NOW COMES THE UNITED STATES OF AMERICA, by and through R. Andrew Murray, United States Attorney for the Western District of North Carolina, and the undersigned Assistant United States Attorney, and hereby submits its objections to the Defense's proposed jury questionnaire submitted to the Court by electronic mail on March 9, 2019.

The Government objects to the Defense questionnaire on the grounds that (1) many of the questions are unnecessarily intrusive, (2) questions 52 through 55 with regards to the burden of proof are misleading, and (3) some of the questions with regards to the juror's religion, ethnicity and race are impermissible.

The Government does not object to the use of a juror questionnaire when given the opportunity to participate in its drafting and when it is provided to prospective jurors well in advance of trial. However, given the limited time before trial, it would be impractical to have each juror complete a 13-page questionnaire

probing every aspect of their lives, including their hobbies, political and religious beliefs, and entertainment preferences.

For the reasons stated herein, the United States suggests that the Court decline the proposed defense questionnaire and employ its usual procedure for the selection of jurors in this case.

RESPECTFULLY SUBMITTED, this 12th day of March, 2019.

R. ANDREW MURRAY
UNITED STATES ATTORNEY

s/Michael E. Savage
North Carolina Bar Number 33159
mike.savage2@usdoj.gov
Assistant United States Attorneys
227 West Trade Street
Carillon Building, Suite 1650
Charlotte, North Carolina 28202
Telephone: 704-344-6222
Fax: 704-344-6629

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all parties and counsel of record by submitting it to the Court's Electronic Filing System.

//s// Michael E. Savage
Assistant United States Attorney